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FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

UNITED MICROELECTRONICS  
CORPORATION, et al.,  
  
Defendants.

CASE NO.: 3:18-cr-00465-MMC

**DECLARATION OF MATTHEW E.  
SLOAN IN SUPPORT OF  
DEFENDANT FUJIAN JINHUA  
INTEGRATED CIRCUIT CO., LTD.'S  
NOTICE OF MOTION AND  
MOTION *IN LIMINE* NO. 3  
TO EXCLUDE THE EXPERT  
TESTIMONY OF TERRENCE DALY**

Judge: The Honorable Maxine M. Chesney  
Trial Date: February 14, 2022

Hearing Date: January 18, 2022  
Hearing Time: 10:00 a.m.

**DECLARATION OF MATTHEW E. SLOAN**

I, Matthew E. Sloan declare and state as follows:

1. I am a partner at Skadden, Arps, Slate, Meagher & Flom LLP, counsel of record for Defendant Fujian Jinhua Integrated Circuit Co., Ltd. (“Jinhua”). I am an attorney licensed to practice law in the State of California and before this Court. I submit this declaration in support of Jinhua’s Motion *In Limine* No. 3 for an Order To Exclude The Expert Testimony of Terrence Daly with respect to his Principal Opinions No. 1, No. 4, and No. 5 (the “Motion”). This declaration is based upon my personal knowledge, and, if called to testify, I could and would do so competently as to the matters set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of the Expert Witness Disclosure of Mr. Terrence Daly (the “Expert Disclosure”), exclusive of any attached exhibits. Because the government marked certain portions of Exhibit A as “Confidential,” Jinhua must file portions of it under seal pursuant to the Protective Order. Accordingly, Jinhua has filed a motion to file this exhibit under seal concurrently herewith, and attaches a partially redacted version of the Expert Disclosure hereto.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 1st day of December, 2021 in Los Angeles, California.

By: /s/ Matthew E. Sloan  
Matthew E. Sloan